

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

THE UNITED STATES OF AMERICA

v.

No. 19-cr-00251-LM

JOHNATHON IRISH

**ASSENTED-TO MOTION TO EXTEND DEADLINE TO RESPOND
TO GOVERNMENT'S MOTION FOR PRELIMINARY ORDER OF FORFEITURE**

Johnathan Irish, through counsel, requests that the Court extend the deadline for him to reply to the government's motion for a preliminary order of forfeiture.

1. The defendant was convicted on a one-count indictment of being a prohibited person in possession of a firearm, in violation of 18 U.S.C. § 922(g)(1). The indictment included a standard forfeiture provision, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), regarding firearms allegedly involved in the offense.

2. After trial, the government filed a motion for a preliminary order of forfeiture pursuant to Rule 32.2(b)(2).

3. Also after trial, the defendant filed a motion for a new trial which alleged ineffective assistance of his trial counsel. That motion led the Court to replace trial counsel with undersigned counsel.

4. Undersigned counsel had no knowledge of or involvement in this case until his appointment. Counsel was appointed on March 4, 2020. Counsel has now met with the defendant at the jail, received discovery from the government, and received the file from prior counsel. Transcripts have been requested and are expected in the next few weeks.

5. Considering the time needed to analyze the discovery (approximately 700 pages of documents plus audio files and photos), review prior counsel's file, review the trial transcripts, and further interview the defendant, counsel is not yet able to make a substantive reply to any motion.

6. Therefore, counsel requests to extend the deadline to reply to the government's motion for preliminary forfeiture to May 1, 2020. That extension will not prejudice the government or result in any inefficiency since it is approximately 4 weeks before the status conference scheduled for May 28, 2020 and before any sentencing hearing.

7. Assistant United States Attorney Anna Krasinski assents to this motion.

8. No additional memorandum is submitted because all legal authority needed to act on this request is contained herein.

WHEREFORE, the defense respectfully requests an extension of the defense deadline to reply to the government's motion for preliminary forfeiture to May 1, 2020.

Date: March 19, 2020

Respectfully submitted,

/s/ Richard Guerriero
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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered Participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as nonregistered participants on the date the document was signed by me.

/s/ Richard Guerriero